

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

Postal Rate and Fee Changes, 1997

Docket No. R97-1

RECEIVED
JAN 22 11 26 AM '98

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
SATURATION MAIL COALITION WITNESS
HARRY J. BUCKEL (NAA/SMC-T1-1-8)
January 22, 1998**

The Newspaper Association of America hereby submits the attached interrogatories to Saturation Mail Coalition witness Harry J. Buckel (SMC-T-1) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

Robert J. Brinkmann
NEWSPAPER ASSOCIATION OF AMERICA
529 14th Street, N.W.
Suite 440
Washington, D.C.
(202) 638-4792

By:


William B. Baker

WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, DC 20006-2304
(202) 429-7255

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the instant document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

January 22, 1998


William B. Baker

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
SATURATION MAIL COALITION WITNESS
HARRY J. BUCKEL (NAA/SMC-T1-1-8)

NAA/SMC-T1-1. At page 8, lines 5-6 of your direct testimony, you state that the smallest of your customers account for more than 80 percent of the ads your carry. What percentage of your revenues are accounted for by these ads?

NAA/SMC-T1-2. Please define the term "saturation-targeted" as used at page 8, line 19 of your direct testimony.

NAA/SMC-T1-3. Please refer to page 8, line 20 of your direct testimony. Please explain why you hand-deliver one of the five saturation-targeted shoppers.

NAA/SMC-T1-4. Please provide the following information regarding your annual mail volumes. (If precise data are not available, estimates are sufficient.)

- a. What proportion of your total annual volume of over 80 million is dropshipped to:
 - i. the destination BMC,
 - ii. the destination SCF,
 - iii. the destination delivery office.
- b. What proportion of your total annual volume is entered at the non-letter rate?
- c. What proportion of your total annual volume exceeds the breakpoint weight of 3.3 ounces?
- d. What proportion of your total annual volume, if any, would be subject to the proposed parcel surcharge if approved by the Postal Rate Commission?

NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
SATURATION MAIL COALITION WITNESS
HARRY J. BUCKEL (NAA/SMC-T1-1-8)

NAA/SMC-T1-5. Please list your principal competitors in the Philadelphia markets.

- a. Which of these competitors rely on the Postal Service delivery of their product?
- b. *Shouldn't you and your competitors want to have available a viable private delivery alternative to the Postal Service?*

NAA/SMC-T1-6. Please refer to page 9 of your testimony. Do any of the six Newport Media Inc. publications to which you refer at page 8 of your testimony publish news and sports reporting?

NAA/SMC-T1-7. Do you believe that your customers get a better response rate when their advertisements are mailed than when they are delivered with a newspaper?

NAA/SAC-T1-8. Do you believe that the prices that you charge customers are usually more or less than the prices charged to them by newspapers?